

Appendix to Briefing Memo: Comparing the Industry-Specific Storm Water Permit for Scrap Recycling Facilities with the Tier 1 General Permit

Requirement	Tier 1 General Storm Water Discharge Permit - WI-S067849-1	WI-S058831-1 Industry-Specific Permit where Cooperative Compliance Program is Elected	WI-S058831-1 Industry-Specific Permit where Cooperative Compliance Program is Not Elected
SWPPP Planning	Permittee develops written SWPPP and submits a signed summary to WDNR.	CCP certifies SWPPP developed by permittee; permittee notifies WDNR of certification.	Same as Tier 1.
Site Assessment	Permittee makes a drainage base map; identifies potential pollution sources; evaluates non-storm discharges.	Same as Tier 1.	Same as Tier 1.
Source Area BMP Selection	Permittee chooses BMPs to prevent contamination, but must address: soil erosion, good house-keeping, preventative maintenance, visual inspections, spill prevention, covering salt, control section 313 water priority chemicals.	Permit specifies the source areas that need to be controlled; permittees with these sources shall select BMPs from a joint CCP/WDNR list of BAT/BCT BMPs, or can install alternative BMPs at their own risk of non-compliance.	Permit specifies the source areas that need to be controlled; permittees with these sources can select BMPs from any source, but are at their own risk of non-compliance.
Treatment Practice Selection	Where source area BMPs not feasible, cost effective, or inadequate; where contaminated by petroleum or significant amounts of sediment; may be subject to WDNR plan review.	Same as Tier 1.	Same as Tier 1.
Employee Training	Permittee provides employee training and awareness program.	Permittee participates in training program sponsored by CCP.	Same as Tier 1.
Implementation Schedule	BMPs are implemented within 24 months of start date, or approved alternate schedule.	BMPs are implemented in phases over ten years.	BMPs are implemented in phases over ten years.
Compliance Inspection	Annual; written.	Monthly; written.	Same as Tier 1.

Visual Inspection of Storm Water Quality	Quarterly at all outfalls.	Not required.	Same as Tier 1.
Non-Storm Water Discharge Evaluation	Semi-annual at all outfalls.	Same as Tier 1.	Same as Tier 1.
Chemical Monitoring	Once during each of second and third years; permittee determines constituents.	Not required.	Annually at all outfalls for TSS, COD, Conductivity, Lead, Copper, Zinc, Naphthalene.
Reporting	Submit reports to WDNR at the end of first, second, and third years.	Performance of SWPPP development and annual CCP training and audit shall be reported to WDNR.	Submit reports to WDNR at the end of each year.